

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,⁸

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

Hearing Date: February 18, 2026 at 10:00 a.m. (ET)

Objection Deadline: January 19, 2026 at 4:00 p.m. (ET)

**NOTICE OF MOTION OF THE LITIGATION TRUSTEE FOR ENTRY OF AN
ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL RULE 2004-1
(I) AUTHORIZING EXAMINATION OF LISA FAIRFAX, (II) REQUIRING
PRODUCTION OF DOCUMENTS, AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on January 5, 2026, Lawrence R. Hirsh, as the Litigation Trustee of the Litigation Trust,⁹ filed the *Motion Of The Litigation Trustee For Entry Of An Order Pursuant To Bankruptcy Rule 2004 And Local Rule 2004-1 (I) Authorizing Examination Of Lisa Fairfax, (II) Requiring Production Of Documents, And (III) Granting Related Relief* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801, at or before **January 19, 2026 at 4:00 p.m. (ET)** (the “**Objection Deadline**”), and served upon and received by the undersigned counsel for the Litigation Trustee.

⁸ The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the “Reorganized Debtors” include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

⁹ Capitalized terms not defined herein have the meanings given to them in the *Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and its Debtor Affiliates* [D.I. 1596-1] (the “**Plan**”).

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801 on **February 18, 2026 at 10:00 a.m. (ET).**]

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: January 5, 2026
Wilmington, Delaware

RAINES FELDMAN LITRELL LLP

/s/ Mark W. Eckard

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